

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

UNITED STATES OF AMERICA  
*ex rel.* Brook Jackson,

Plaintiff,

v.

VENTAVIA RESEARCH GROUP, LLC;  
PFIZER INC.; ICON PLC,

Defendants.

CASE NO. 1:21-cv-00008-MJT

**UNOPPOSED MOTION TO AMEND SCHEDULING ORDER**

On August 28, 2023, Relator Brook Jackson and Defendants Ventavia Research Group, LLC, Pfizer Inc., and ICON PLC appeared before this Court for a case management conference. The Court entered its First Amended Scheduling Order setting a deadline of September 15, 2023 for Relator to move for leave to file her Amended Complaint and a deadline of September 30, 2023 for Relator to file her corrected Second Amended Complaint.

Relator was of the understanding, following the discussion with Judge Truncale and opposing counsel at the case management conference, that she was going to circulate a proposed second amended complaint to Defendants on September 15, 2023, to determine whether Defendants would stipulate to leave for filing the amended pleading or whether a motion for leave to amend would be necessary. However, this is not reflected in the deadlines set forth in the First Amended Scheduling Order.

Relator's counsel have conferred with Defendants' counsel and now seek to clarify

and/or amend the scheduling order, to conform to Relator's understanding: that is, Relator will first provide the proposed second amended complaint to Defendants before filing a motion for leave. In the event that the parties are unable to stipulate to the filing, Relator will file a motion for leave by September 30, 2023.

Furthermore, Relator requires a short extension of time in which to complete the drafting of the proposed Second Amended Complaint. Relator has requested that Defendants' agree to an extension of one court day (including over the weekend), such that the revised proposed second amended complaint would be provided to Defendants' counsel by Monday, September 18, 2023.

Defendants do not oppose the request for adjustment of the scheduling order, or the additional court day in which to provide the proposed pleading.

As such, Relator makes this unopposed motion to adjust the Court's First Amended Scheduling Order, to reflect that Relator's proposed second amended complaint is to be provided to Defendants' on or before September 18, 2023, and that Relator will file either a stipulation or motion for leave to file a second amended complaint, whichever is necessary, on or before September 30, 2023.

Dated: September 15, 2023

Respectfully submitted,

/s/ Lexis Anderson

Lexis Anderson, Esq.

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*Attorneys for Relator Brook Jackson*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of September 2023 a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5. All counsel of record consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

*/s/ Lexis Anderson*

Lexis Anderson

**CERTIFICATE OF CONFERENCE**

Relator, through undersigned counsel, files this Certificate of Conference to verify that Counsel have complied with the meet and confer requirement in Local Rule CV-7(h). On September 15, 2023, Counsel for Relator contacted Counsel for Defendants Ventavia Research Group, LLC, Pfizer, Inc., and ICON PLC, and informed them of Relator's intent to file her within Motion to Amend Scheduling Order. Defendants are unopposed to the motion.

Dated: September 15, 2023

/s/ Lexis Anderson  
Lexis Anderson